

REMARKS

Applicants request favorable reconsideration and withdrawal of the rejections set forth in the above-noted Office Action, in light of the foregoing amendments and the following remarks.

Claims 1-12, 14, 15, and 17-26 are presented for examination, with claims 1 and 12 being independent. The independent claims have been amended to distinguish Applicants' invention from the cited art. Support for these amendments may be found at paragraphs [0011], [0014], [0018]–[0020], and [0040] of Applicants' published specification, as well as in Fig. 1. Claims 2, 24, and 25 have been amended simply to attend to matters of consistency and form. No new matter has been added by any amendment.

Claims 1-12, 14, 15, and 17-26 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0049853 to Chu et al. ("*Chu*") in view of newly-cited U.S. Patent Publication No. 2003/0041095 to Konda et al. ("*Konda*"). Without conceding the propriety of the rejection, Applicants have amended the independent claims and submit that these claims, as well as the claims depending from them, are patentably distinct from the cited art for at least the following reasons.

Amended independent claim 1 recites a system to facilitate movement of electronic files that includes a messaging infrastructure component, a file transfer services component, a file transformation component, and a centralized file management hub. The centralized file management hub includes a file tracking and monitoring component, which is configured to provide end-to-end tracking of a file and role based multi layered tracking information. Only the file transfer services component provides to a user an entry point into the system. A system configured in this manner is an integrated one, providing functional components divided over a number of geographically-dispersed servers, as discussed at paragraph [0012]. Thus, a user of

the system need not individually access each component to benefit from its functionality; the components may be configured to interact with each other and/or through the file transfer services component. An example of a system configured in this manner is illustrated in Fig. 1.

In rejecting claim 1, the Office Action relies on *Chu* for teachings of a messaging infrastructure component and a centralized file management hub that includes file tracking and monitoring component. A client device that issues instructions is cited in paragraph 8 as teaching the claimed messaging infrastructure component. A digital asset distribution (DAD) server is cited in paragraph 10 as teaching a centralized file management hub. A graphical user interface of the client device, which includes a tracking component, is cited in paragraph 12 as teaching a file tracking and monitoring component.

The *Chu* publication fails to teach or suggest the messaging infrastructure component recited in claim 1. In the *Chu* system, the client device is controlled by client software, which is operated by a user, as discussed at paragraph [0051] of *Chu*. Thus, the client device provides an entry point into the *Chu* system. In contrast, a feature of the claimed messaging infrastructure component is that it does not provide an entry point into the system. Accordingly, *Chu* fails to teach the features of the messaging infrastructure component, as recited in claim 1.

Chu further fails to teach or suggest the centralized file management hub recited in claim 1. In the *Chu* system, the DAD server is separate from the client device, as illustrated in Figs. 1 and 5; the DAD server does not include the client device. Thus, *Chu* cannot be said to teach a centralized file management hub that includes a file tracking and monitoring component, as recited in claim 1. Moreover, as discussed above, the client device provides an entry point into the *Chu* system. However, the claimed centralized file management hub, which includes claimed file tracking and monitoring component, does not provide an entry point into the system.

Accordingly, *Chu* further fails to teach all of the features of the centralized file management hub, as recited in claim 1.

The secondary citation to *Konda* fails to compensate for the deficiencies of *Chu*. *Konda* generally relates to a data transformation system. However, *Konda* contemplates neither a centralized file management hub nor a messaging infrastructure component. Applicants thus submit that the cited art, whether taken alone or in combination, neither anticipates nor renders obvious the system recited in independent claim 1.

Claim 12 recites a method to facilitate the movement of electronic files within a system. Claim 12 has been amended to recite features similar to those discussed above with respect to claim 1. Therefore, the reasoning set forth there is similarly applicable to claim 12. Accordingly, Applicants submit that the cited art neither anticipates nor renders obvious the method recited in independent claim 12.

The remaining rejected claims in this application depend from either claim 1 or claim 12, and are thus submitted to be patentable at least due to their dependency on a patentable independent claim.

For at least the reasons above, Applicants submit that the rejection set forth in the above-noted Office Action has been overcome, and thus the application is in condition for allowance. Applicants request favorable reconsideration, withdrawal of the rejection, and an early Notice of Allowance.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

/Lawrence A Stahl/

Lawrence A. Stahl
Attorney for Applicants
Registration No. 30,110

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

FCHS_WS 3675119_1